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January 22, 1985

## FEDERAL EXPRESS

Mr. Neil Thompson  
Air and Waste Management Division  
U.S. EPA  
1200 Sixth Avenue  
Seattle, WA 98101

Re: EPA Contract No. 68-01-6769  
GCA Work Assignment No. 84-283

Dear Neil:

Enclosed is the Final Report for the Green Acres Landfill site. With this submission, TechLaw research on this site under Work Assignment No. 84-283 is completed.

Feel free to call, however, if questions relating to this research arise, as you pursue this case.

Very truly yours,

  
James J. Kerr

JJK/ssl  
Enclosure

cc: Sandra Goodrich

USEPA SF



1632322

FINAL REPORT  
GREEN ACRES LANDFILL

Prepared by  
TechLaw, Inc.  
12011 Lee Jackson Memorial Highway  
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on

January 21, 1985

ENVIRONMENTAL  
CONTRACT

EPA Contract No. 68-01-6769  
GCA Work Assignment No. 84-283

GCA NUMBER 84-283-001-66

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JAN 24 1985  
U.S. ENVIRONMENTAL PROTECTION AGENCY  
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FINAL REPORT  
GREEN ACRES LANDFILL

I. INTRODUCTION

Project Background

EPA Region X requested assistance in the identification of potentially responsible parties for the Green Acres Landfill site near Spokane, Washington. The regional contact, Mr. Neil Thompson, provided specific direction regarding the information to be developed.

The Work Assignment required TechLaw to obtain documents relevant to the site from the Spokane County Public Utilities Department, the Washington State Department of Ecology (DOE) regional office, and any other involved state and local agencies. TechLaw was directed to focus on information and documentation that describes waste practices, the types of wastes deposited at the site, and the names of generators and transporters as users of the site. TechLaw was asked to have documents copied and transmitted to it, wherever possible. Additionally, TechLaw was directed to have a title search performed of the site and to provide copies of any deeds and leases referencing the site.

TechLaw traveled to Washington to review records and conduct interviews with persons who are knowledgeable of the site operations as described above. Information regarding potentially responsible parties was included in a Draft Report dated November 15, 1984.

Mr. Neil Thompson reviewed the Draft Report and indicated to TechLaw that no changes were necessary. TechLaw was directed at that time to submit the report as Final.

Project Approach

TechLaw made telephone contact with the individuals listed below and, depending on each person's involvement with the case, inquiries were made regarding the information requested by EPA and, in particular, regarding relevant agency records. Each person was advised that TechLaw was under contract to U.S. EPA Region X in Seattle to request the information and that all such information was ultimately to be transmitted to EPA.



Individuals Contacted by TechLaw

Mr. Damon T.K. Taam: Design Engineer, Spokane County Public Utilities Department (509) 456-3604

Mr. James Legat: Utilities Engineer, Spokane County Public Utilities Department (509) 456-3604

Mr. James Malm: DOE Eastern Regional Office (509) 456-2926

Mr. Howard Hay: former Solid Waste Investigator, Spokane County Public Utilities Department (b) (6) [REDACTED]

Mr. Paul "Bill" Wilson: former site operator contractor (b) (6) [REDACTED]

Mr. Michael Ruef: Remedial Response, DOE (206) 459-6304

Mr. Dennis Kroll: Director, Environmental Health Division, Spokane County Health District (509) 456-3630

Washington State Utilities Transportation Commission:  
(206) 753-6423

TechLaw personnel travelled to Spokane, Washington to pursue the investigation. The persons listed below were contacted by TechLaw, in person, regarding their knowledge of site activities. Depending on each person's involvement with the site, inquiries were made regarding the information requested by EPA.

Individuals Interviewed by TechLaw:

Mr. Damon T.K. Taam: Design Engineer, Spokane County Public Utilities Department, Spokane (509) 456-3604

Mr. James Legat: Utilities Engineer, Spokane County Public Utilities Department, Spokane (509) 456-3604

Mr. James Malm: DOE Eastern Regional Office, Spokane (509) 456-2926

Mr. Howard Hay: former Solid Waste Investigator, Spokane County Public Utilities Department, Spokane (b) (6) [REDACTED]

Mr. Paul "Bill" Wilson: former site operator contractor, Spokane (b) (6) [REDACTED]

Additionally, TICOR Title Insurance completed a title search of the site and provided to TechLaw copies of all deeds and leases relating to the property from 1950 to the present. These title documents are enclosed in Attachment I.

## II. SITE RELATED RECORDS

A. Source: Department of Ecology, Eastern Regional Office. On September 26, 1984, TechLaw personnel reviewed DOE files. The only relevant document, entitled "Potential Hazardous Waste Site--Site Inspection Report", was copied by TechLaw.

B. Source: Spokane County Health District. On September 25, 1984, TechLaw personnel reviewed the Health District files. Relevant site documents were identified and copied by TechLaw. These records included newspaper articles, test sampling results, correspondence, land transaction documents, and various internal memoranda.

C. Source: Spokane County Public Utilities Department. On September 25-26, 1984, TechLaw personnel reviewed the Utilities Department's files. Relevant site documents were identified by TechLaw and ultimately copied by Spokane County personnel and sent to TechLaw in October. These records included invoices, receipts, ledgers, land transaction documents, newspaper articles, and various internal memoranda and correspondence.

D. Source: U.S. Environmental Protection Agency, Region X. In August 1984, EPA's Region X office sent TechLaw a copy of a document relevant to the site, consisting of well sampling results in the vicinity of the landfill.

Some of the documents TechLaw obtained are in Attachment I, ordered chronologically and numbered sequentially. Other documents obtained by TechLaw, as described in Section V.B. of this report, are being retained by TechLaw, pursuant to Mr. Thompson's instructions, for possible use in a subsequent transaction database project.

## III. TITLE SEARCH

The copies of the deeds and leases relating to the site from 1950 to the present, as determined by the title search firm, are included in Appendix I. The following summary of the property history is based upon those documents. To assist in following the transactions involving different portions of the site, several maps of the site area are included in Appendix II. Each map depicts a certain section of land identified by a letter from "A" to "H". These portions of land will be referred to by these letters in the following property history.

On January 22, 1930, the State of Washington deeded Section "A" to (b) (6). On September 10, 1951, (b) (6) deeded Section "A" to Greenacres Township for as long as it remained a township dump site. On September 1, 1959, (b) (6) and (b) (6), deeded to (b) (6) and (b) (6) all of (b) (6) Section "B" and the rights to Section "A" when it ceased being used as a township dump site. On March 17, 1960, the (b) (6) deeded their right to Sections "A" and "B" to Greenacres Sanitation Company. At this point, Greenacres Township owned the entire landfill area (Reference "H"). On January 19, 1967, Greenacres Development Company (formerly Greenacres Sanitation Company) deeded to Spokane County all of Section "C" and the rights to Section "A" when it ceased to be a dump site. The latter transfer of rights was reinforced on March 24, 1967 by Greenacres Township filing a Quitclaim Deed for Section "A" in favor of Spokane County.

On June 16, 1967, Greenacres Development Company deeded Section "D" to (b) (6) and (b) (6). On May 13, 1971, the (b) (6) conveyed Section "D" to Holiday Hills Recreation Center, Inc. On October 29, 1971, Holiday Hills deeded Section "E" to Spokane County in return for Spokane County deeding Section "F" to Holiday Hills on November 11, 1971. On July 27, 1972, Spokane County deeded Section "E" back to Holiday Hills.

On September 8, 1972, Spokane County deeded Section "G" to (b) (6) and (b) (6). On March 14, 1973, the (b) (6) deeded Section "G" to the (b) (6). On July 26, 1976, the (b) (6) conveyed Section "G" to Holiday Hills and, on the same day, Holiday Hills deeded Section "G" to (b) (6), acting as a trustee. On September 6, 1977, Holiday Hills assigned its interest in the latter deed to (b) (6) and his (b) (6), and (b) (6) and (b) (6). On the same day, these two couples assigned their interests to Seattle First National Bank. Finally, on December 15, 1978, Seattle First National Bank conveyed this interest back to Holiday Hills. At the present, Holiday Hills owns the entire landfill site.

The several owners of the dump area, the portions of the site that they owned or had rights to, and the term of their property interests are displayed in a table included in Appendix II.

#### IV. BACKGROUND SITE INFORMATION

The Green Acres Landfill was located on about 55 acres of land about fourteen miles east of Spokane, Washington. The landfill area itself, a former ravine and borrow pit on a hillside (48)<sup>1</sup>, covered about 35 acres (Legat) or 50 acres (43) at the time of its largest expanse. The ground in the dumping area was mostly sand with some decomposed granite (Wilson). Some of the land surrounding the landfill, though also owned by the site

<sup>1</sup>References to supporting documents or interviewees will be presented by document number or interviewee name, respectively.



owners, was not used for dumping because it was too rocky (Legat, Wilson). According to an EPA memo, the site is located over the Spokane Valley Aquifer, a source of drinking water for 350,000 people in the region, and its highly permeable soil may allow leachate to enter that aquifer (48).

The site was used for dumping at least back through the late 1940's (Hay). The owner of the land then, (b)(6), allowed hauling to the property for a fee and generally tried, for volume reduction purposes, to burn anything that was deposited (Hay, Legat). In 1951 the property was deeded to Greenacres Township for use as a municipal dump (43). The township owned the site, and contracted for site operators, from 1951 through March 1967. No information was uncovered as to who was contracted to serve as site operators from 1951 through 1957. From February 1958 through February 1965, Mr. Virgil Carroll and Mr. William C. Peterson were contracted to operate the site (1). From April 1965 through June 1966 Mr. Carroll and Mr. Myron S. Hehr were contracted as site operators (6). From June 1966 through June 1968 Mr. William C. Hohner served as the landfill operator (7,8).

The township installed a shed at the entrance of the site, where an attendant was positioned to meet any haulers (Legat). Anyone was allowed to deposit any kind of waste at the site upon the payment of the appropriate fee (Legat, Wilson, Hay). Regular automobiles were charged \$.50 a load, pickup trucks and trailers were billed \$.75, and trucks (including industrial haulers) were charged \$.31 per cubic yard (9). Commercial collectors of garbage were required to pay 7% of their gross income from their activity. In 1971, the charges were set at 16% of gross income for commercial haulers and at \$.50 per cubic yard for vehicles (with a minimum charge of \$.75 for automobiles) (15).

Residents of the county and commercial and industrial generators were allowed either to bring their own waste to the site or to have it picked up and delivered to the landfill by the commercial haulers licensed to service the surrounding geographic area (Legat). The state regulatory structure generally allows only one commercial transporter to be certified to operate within a given area (Taam). Haulers had the option of paying in cash for their load, receiving a receipt ticket in return, or having the bill added to their charge accounts, if they had been allowed one by the county (Legat). Haulers charging their deposits also were given receipts. Large volume, industrial customers typically--if not unanimously--maintained charge accounts (Legat, Hay, Wilson).

After haulers arranged the payment of their bills, they were typically--if not always--directed to dump their loads into trenches dug on the site (Wilson, Hay). When these trenches were full, they were set afire to try to reduce the refuse's volume (Wilson, Hay). Subsequently, the trenches were covered with dirt (Wilson, Hay). According to a land appraiser's subsequent report, the ten acres used for landfill area prior to 1966 were covered with less than two feet of earth (43).

Site operations continued in this manner until March 1967 when, as a result of the dissolution of the township governmental structure in Spokane County, the Spokane County Health Department was assigned responsibility for operating and regulating the site (43, Legat). The Health Department contracted with Mr. Virgil Carroll to handle the daily operation of the site (Legat). The Health Department began to limit the on-site burning of materials, but fires frequently broke out spontaneously (Legat).

In April 1968, the County Engineer's Office within the Spokane County Road Department was assigned the responsibility for the county's waste sites (43, Legat). The Road Department retained this responsibility through the site's closure in 1972, letting annual contracts for the site's operation. From June 1968 through June 1971, Mr. Paul "Bill" Wilson was contracted to operate the site (11,13). The Road Department imposed the first restrictions on what could be brought to the landfill by prohibiting car bodies (Legat). The Road Department also began operating the site as a sanitary landfill, covering the deposits each day with six inches of dirt and adding another two feet of dirt when a portion of the site was to be excluded from further dumping (43, Legat). The site usually had one or two bulldozers and two or three people working on it at any time (Legat, Wilson, Hay).

Even though the Road Department allowed everything but car bodies at the site, special handling was used for materials judged hazardous (which, by the Road Department's definition at the time, included anything potentially toxic, flammable, odorous, or even messy) (Legat). The Road Department depended, however, on haulers notifying it prior to the delivery of the hazardous substances (Legat, Hay). Mr. Hay would confer with individuals from DOE and the Health Department to decide how to handle problem materials (Hay). For liquid wastes, such as chemicals or pesticides, a special hole might be dug for containment or the wastes could be dumped off to the side of the landfill area and allowed to evaporate (Hay, Wilson). Because liquid wastes were estimated to account for less than one percent of the site's contents (Wilson, Hay, Legat), such treatment was infrequently necessary.

On November 11, 1971, Spokane County deeded a portion of the landfill to Holiday Hills Recreation Center, Inc., in return for being deeded a portion of equal acreage of Holiday Hills' land adjoining the site (16, 18-24). This trade of land was done so that the county could obtain covering soil for the landfill from the new land and/or use it for disposal of wastes (since the original site area was by then almost full). On March 31, 1972, the site was closed because it was filled to capacity (43). In July and September 1972, Spokane County sold the site property (26,27).

In 1980, during a routine aquifer monitoring program conducted by the state, a well owned by (b) (6) that was located near to and downgradient from the landfill was found to be contaminated with volatile organics (30, 32, 33, 29). Due to the subsequent increasing levels of contaminants found, (b) (6) was advised by the Spokane County Health District to find alternative supplies of water (29, 30, 32, 33). In



1983, (b)(6) and (b)(6) filed a claim for damages with the county, alleging contamination of their property and injury to themselves resulting from the former county-run landfill (42, 47). In June 1984, (b)(6) filed suit against Spokane County and the operators of the site, alleging contamination from the landfill (42). Further monitoring of wells in the area by the Health District has continued due to concern over possible contamination of the aquifer underneath the site (30, 31, 36).

#### V. PRELIMINARY RESPONSIBLE PARTY INFORMATION

##### A. Owners and Operators

According to Mr. Hay, dumping was done on the site at least by the late 1940's, when the property was supposedly owned by (b)(6) Carlson. While (b)(6) Carlson's name did not appear in any document uncovered by the title search, these documents did indicate that the site's original owners were named Carlson. Whether the absence of (b)(6) Carlson's name from the property history is due to transactions taking place prior to the 1950 start of the title search or for other reasons is unclear. Further research can be conducted in this regard if EPA determines that it is necessary. In 1951 the owner of part of the site, (b)(6) Carlson, deeded her property to Greenacres Township for use as a township dump. In 1959, (b)(6) Carlson and (b)(6) sold their portion of the site to (b)(6) Meyers and (b)(6). In 1960 the Meyerses sold this property to the township. The site was operated under contract from the township by Mr. Virgil Carroll and Mr. Willard Peterson from February 1958 through March 1965 (1), by Mr. Carroll and Mr. Myron Hehr from April 1965 through June 1966 (6), and by Mr. William Hohner from June 1966 through June 1968 (7,8).

In 1967, the township sold the then existing site property to Spokane County. In 1971, the county transferred a portion of the site to Holiday Hills Recreation Center in return for some of Holiday Hills land to be used for dumping and/or cover for the remaining landfill area. From June 3, 1968 through June 1971 the contracted site operator was Mr. Paul "Bill" Wilson (11,13). In 1972, the county sold the site property, with all of it now being owned by Holiday Hills.

A brief summary of owners and operators is as follows:

(b)(6) Carlson, owner  
(b)(6) Carlson, owner(?) / operator  
Greenacres Township, owner/operator  
(b)(6) Carlson, owner  
(b)(6) (b)(6) Carlson, owners  
(b)(6) Meyers, owners  
Virgil Carroll, operator  
Willard Peterson, operator  
Myron Hehr, operator  
William Hohner, operator

Spokane County, owner/operator  
Holiday Hills Recreation Center, Inc., owner  
(b) (6), owners  
Paul "Bill" Wilson, operator  
(b) (6) owners  
(b) (6) owner

B. Waste Generators

The individuals interviewed by TechLaw identified the following parties as having generated wastes deposited at the Green Acres Landfill site:

Washington Department of Agriculture: Mr. Legat stated that this state agency arranged and paid for the disposal of pesticides at the site which it had accumulated from its work with farmers.

Columbia Lighting: Mr. Wilson (site operator) stated that this company brought truckloads of paint to the site.

Spokane Rendering Company: Mr. Wilson stated that this company brought the remains from its animal processing operations to the site.

Quiki-Box: Mr. Wilson stated that this company made frequent deposits at the site.

Sign Indicator: Mr. Hay stated that this company may have used the site.

Western Farmers: Mr. Hay stated that this company (which may have since become incorporated into another company called Cenex) dumped pesticides at the landfill around 1964.

Also, Mr. Legat, Mr. Wilson and Mr. Hay all stated that farmers sometimes deposited their pesticides at the site.

In addition to these personal recollections by the individuals TechLaw interviewed, TechLaw obtained records from Spokane County Public Utilities Department which provide detailed listings of generators and haulers associated with Green Acres Landfill. One document (53) provides a list of charge account customers at Green Acres as of June 4, 1970. Other records could only be fully exploited by inputting the data contained within them into a computerized database. Since this task may be a follow-up project, this report will describe the records which are available and which will be retained by TechLaw for possible future use. All of these records are for charge account customers only--individuals or businesses who hauled their waste to the site themselves and were billed on a monthly basis.



1) Receipts for charge account customers: These are receipts given to charge account customers when they deposited waste at the site. The receipts indicate the customer's name, the charge for the volume of materials dumped, and the date of the transaction. These receipts exist for transactions from December 4, 1969 through December 23, 1970.

2) Monthly bills for charge account customers: These are the monthly invoices sent to charge account customers indicating their charges for the preceding month. The invoices indicate the customer's name, the charge for the month, and the receipt numbers for each of the transactions by the customer during the month. These invoices exist for 1968, 1969 and 1970.

3) Ledgers of charge account customers: These are ledgers indicating the transactions by charge account customers. These ledgers indicate, for each day of the year, the customers who came to the site and the amount of the charge. These ledgers exist for 1968, 1969 and 1970. A yearly total also exists for 1966, showing the customer's name and the amount charged throughout 1966.

4) Fund transmittals: These are fund transmittal forms used by the Spokane County Road Department to accompany charge account customers' monthly payments when sent to the County Treasurer. These forms indicate the customer's name, the amount of the payment, the date of transmittal, and the number of the invoice which was involved in the transaction. These forms exist from February 1969 through July 1970.

5) Charge account requests and approvals: These are letters between Spokane County officials and potential charge account customers in which a charge account at the site is requested by a customer or approved by the county. These letters indicate the customer's name and the correspondence's date. Letters of this type exist from 1961 through 1966 and 1968 through 1971.

Mr. Neil Thompson of Region X EPA requested that TechLaw attempt to provide a preliminary indication of some of the major generators using the site. A list of the top ten generators who were charge account customers during years for which the data were more readily accessible is on the following page. The tables for 1968, 1969, and 1970 are based on data derived from monthly summaries of charge account customers' billings compiled by the Spokane County Road Department. The table for 1966 is based on data derived from an annual summary of charge account customers' billings compiled by Greenacres Township. As is obvious, those generators placing in the top ten varied considerably over even just these few years, as did the volume of their deposits.

# TOP TEN GENERATORS

## AMONG CHARGE ACCOUNT CUSTOMERS

<u>1966</u>		<u>1968 (4/68 - 12/68)</u>	
<u>Cubic Yards</u>	<u>Customer</u>	<u>Cubic Yards</u>	<u>Customer</u>
2,869	Union Pacific Railway	414	Suntex Plywood
2,524	Quiki-Box	403	Union Pacific Railway
516	Boise Cascade	402	Capp Homes
456	Rainway Mfg.	342	Nitico, Inc.
400	Poultry Processors	228	Quiki-Box
333	Spokane Seed	99	Boise Cascade
286	Washington State Highway	72	Jacklin Seed
283	West Valley #363	62	Spokane Seed
256	Central Valley #356	56	Central Valley School
221	Jacklin Seed	45	Rena Ware

  

<u>1969</u>		<u>1970</u>	
<u>Cubic Yards</u>	<u>Customer</u>	<u>Cubic Yards</u>	<u>Customer</u>
5,839	Nitico, Inc.	6,671	Quiki-Box
4,227	Union Pacific Railway	6,403	G.O. Larson
3,970	Quiki-Box	3,477	GMR, Inc.
2,356	Suntex Plywood	2,437	George Julien
2,102	Capp Homes	2,224	Jim's Transfer
1,325	Boise Cascade	2,084	Earl Mong
1,109	Walker Building Corp.	1,977	Boise Cascade
1,046	Kelp Brothers	1,829	Union Pacific Railway
854	Crane Service, Inc.	1,526	Suntex Plywood
762	Earl Mong	1,447	Self Service Furniture

### C. Carriers and Transporters

In Washington commercial waste hauling is closely regulated by the state, with such transporters required to be certified by the state Utilities Transportation Commission and generally awarded monopolies for service within a given geographic area. Individuals and businesses are free, however, to transport their own waste, but not that of anyone else, to dump sites. In the Green Acres Landfill area, the two major certified commercial haulers have been Sunshine Disposal (known as Suburban Refuse until about 1983) and Valley Refuse. These haulers have been operating in the area for the entire active life of the site (Legat). Suburban Refuse carried most of the commercial and industrial waste for the large companies in the area, while Valley Refuse transported mostly residential refuse and waste from small businesses (Legat, Wilson, Hay).

Just as the companies who were charge account customers hauling their own waste to the site had their transactions noted in the sets of detailed records described in the preceding section, so too were records maintained of deposits from commercial haulers. These documents are also in TechLaw's possession. However, they do not indicate what materials the commercial haulers brought to the site, nor from whom they were obtained. But due to their status as regulated monopolies, commercial haulers must maintain detailed records of their transactions for government auditors to examine. If the two certified transporters in the site area have retained their records for previous years, they may contain transaction information during the time the site was operational.

## VI. CONCLUSIONS AND RECOMMENDATIONS

The records obtained by TechLaw and TechLaw's discussions with state and local officials, as described in the body of this Final Report, provide a detailed description of the site's history, including its owners and operators, and preliminary indications of many of the generators and haulers of waste that was ultimately deposited at the Green Acres Landfill. Other records which are available, but from which data was not extracted pursuant to EPA instructions, are also described in this report.

With this accumulated information as a foundation, the following are TechLaw's recommendations on ways of obtaining additional information and records identifying potential responsible parties:

Construct transaction databases from available records. As noted in this report, TechLaw obtained a substantial number of records (such as receipts, invoices, ledgers, etc.) describing in detail specific waste transactions engaged in by charge account customers at the site. Relevant data could be extracted from these records and placed in a computer database for further processing. This would make the information more easily accessible and analyzable.

Contact haulers and generators identified in this report. EPA could request information relevant to specific transactions engaged in by the waste haulers and generators noted in this Draft Report. Additionally, other potential responsible parties may be identified by these individuals and organizations.

Contact commercial haulers in the site area. As explained in this report, commercial waste haulers in Washington are awarded state government regulated monopolies for service within specific geographic areas. Since they must maintain detailed records of their financial operations for government audits, it is possible that these records may contain useful information regarding these haulers' individual customers. It would be desirable to determine whether these haulers still possess their records for the time period during which the site was operational.

Corporate status update on site users. At some later time, after the initial identification of generators and haulers associated with the site, it would be desirable to determine the current corporate status of the users of the site.

Contact early site owners. While TechLaw was able to obtain records during some of the time the site was government-owned and operated, no documents were uncovered describing the site operations and waste practices prior to its sale to Greenacres Township. It may, therefore, be useful to attempt to contact the previous private owners of the site area to obtain their knowledge of the site's early history.



















